

**TRENK, DiPASQUALE,  
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Ross J. Switkes

*Counsel to Andrea Dobin, Chapter 12 Trustee*

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW JERSEY**

In re:

ANTHONY M. MORTELLITE, JR. and  
COLLEEN MORTELLITE,

Debtors.

Case No. 17-21818 (ABA)

Chapter 12

Honorable Andrew B. Altenburg, U.S.B.J.

In re:

BLUES BROTHERS, LLC,

Debtor.

Case No. 17-21820 (ABA)

Chapter 12

(Jointly Administered)

**JOINDER OF ANDREA DOBIN, CHAPTER 12 TRUSTEE IN THE  
MEMORANDUM OF LAW IN REPLY TO DEBTORS' POST-TRIAL  
SUBMISSION FILED BY FARM CREDIT EAST, ACA**

ANDREA DOBIN, Chapter 12 Trustee (the "Trustee") for Anthony M. Mortellite, Jr., Colleen Mortellite, and Blues Brothers, LLC (collectively, the "Debtors"), by and through her undersigned counsel, hereby joins in the Memorandum of Law in Reply to Debtors' Post-Trial Submission (the "Reply") filed by Farm Credit East, ACA. Docket No. 184.

For the reasons set forth in the Reply, the Trustee respectfully joins in the Reply, adopts the positions presented therein, and respectfully request that the Court deny confirmation of the Debtors' second modified plan.

Respectfully,

**TRENK DIPASQUALE**  
**DELLA FERA & SODONO, P.C.,**  
*Counsel to Andrea Dobin,*  
*Chapter 12 Trustee*

By: /s/Ross J. Switkes  
ROSS J. SWITKES

Dated: December 13, 2017